

MELANIE MORGAN, ESQ.
Nevada Bar No. 8215
SCOTT R. LACHMAN, ESQ.
Nevada Bar No. 12016
AKERMAN LLP
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134
Telephone: (702) 634-5000
Facsimile: (702) 380-8572
Email: melanie.morgan@akerman.com
Email: scott.lachman@akerman.com

*Attorney for Defendant Nationstar Mortgage LLC
d/b/a Mr. Cooper*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRETT PADALECKI, individually, on behalf
of himself and other similarly situated

Plaintiff,

vs.

NATIONSTAR MORTGAGE LLC d/b/a MR.
COOPER,
Defendant.

CASE NO. 2:21-cv-0938-RFB-VCF

**STIPULATION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

Defendant Nationstar Mortgage LLC d/b/a Mr. Cooper (Nationstar and Padalecki are collectively referred to as the “Parties”), by and through their respective attorneys of record, hereby submit the following Stipulation:

On May 14, 2021, Plaintiff filed his Complaint [ECF No. 1]. The Summons to Defendant was issued on May 14, 2021 [ECF No. 4]. Defendant has 21 days from when the summonses was served, May 20, 2021, in this instance, to file its responsive pleading. Because Defendant’s counsel is still investigating the allegations raised in Plaintiff’s Complaint, the Parties have discussed extending the deadline for Defendant to respond to the Complaint by thirty days to July 9, 2021.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to file its responsive pleading to July 9, 2021.

This is the first stipulation for extension of time for Defendant to respond to Plaintiff's Complaint. The extension is requested in good faith and is not for purposes of delay or prejudice to any other party.

Dated this 4th day of June, 2021.

AKERMAN LLP

/s/ Melanie Morgan

MELANIE MORGAN, ESQ.
Nevada Bar No. 8215
SCOTT R. LACHMAN, ESQ.
Nevada Bar No. 12016
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134
Telephone: (702) 634-5000
Facsimile: (702) 380-8572
Email: melanie.morgan@akerman.com
Email: scott.lachman@akerman.com

*Attorneys for Defendant Nationstar
Mortgage d/b/a Mr. Cooper*

Dated this 4th day of June, 2021.

FREEDOM LAW FIRM, LLC

/s/ George Haines

GEORGE HAINES, ESQ.
Nevada Bar No. 9411
FREEDOM LAW FIRM, LLC
8985 S. Eastern Ave., Suite 350 Las
Vegas, Nevada 89123
Telephone: (702) 880-5554
Facsimile: (702) 385-551
ghaines@freedomlegalteam.com

NORBERTO J. CISNEROS, ESQ.
Nevada Bar No. 8782
BARBARA M. MCDONALD, ESQ.
Nevada Bar No. 11651
MADDOX & CISNEROS LLP
3230 S. Buffalo Drive, Suite 108 Las
Vegas, Nevada 89117
Telephone: (702) 366-1900
Facsimile: (702) 366-1999

MICHAEL KIND, ESQ.
Nevada Bar No.: 13903
KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123
Telephone: (702) 337-2322
Facsimile: (702) 32
mk@kindlaw.com

Attorneys for Plaintiff

IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge

Dated: 6-7-2021

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Akerman LLP, and that on the 4th day of June, 2021, I caused to be served a true and correct copy of the foregoing **STIPULATION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**, in the following manner:

☒ (ELECTRONIC SERVICE) Pursuant to FRCP 5(b), the above referenced document was electronically filed on the date hereof with the Clerk of the Court for the United States District Court by using the Court's CM/ECF system and served through the Court's Notice of electronic filing system automatically generated to those parties registered on the Court's Master E-Service List.

George Haines, Esq. FREEDOM LAW FIRM, LLC 8985 S. Eastern Ave., Suite 350 Las Vegas, NV 89123 ghaines@freedomlegalteam.com Attorneys for Plaintiff	Norberto J. Cisneros, Esq., Barbara M. McDonald, Esq., MADDOX & CISNEROS LLP 3230 S. Buffalo Drive, Suite 108 Las Vegas, Nevada 89117 Attorneys for Plaintiff
Michael Kind, Esq. KIND LAW 8860 South Maryland Parkway, Suite 106 Las Vegas, Nevada 89123 mk@kindlaw.com Attorneys for Plaintiff	

☐ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed below at their last-known mailing addresses, on the date above written: N/A.

☐ (PERSONAL SERVICE) By causing to be personally delivered a copy of the above-referenced document to the person(s) listed below: N/A.

☐ (EMAIL) By emailing (as opposed to the Court's electronic service) a true and correct copy of the above-referenced document to the person(s) listed below: N/A.

I declare that I am employed in the office of a member of the bar of this Court at whose discretion the service was made.

/s/ Carla Llarena
An employee of AKERMAN LLP